

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

ANTHONY TRUPIA,
Plaintiff

v.

Case No. CIV-24-498-SLP

REAGAN GOLD GROUP LLC, et. Al,
Defendants

DECLARATION OF DEFENDANT STEVE FRANCIS

Declarant, Defendant Steve Francis, states as follows:

1. My name is Steve Francis. I am older than 18 years old and otherwise *sui juris*. I make this declaration based on personal knowledge unless otherwise stated herein.
2. I submit this declaration in support of the Motion to Dismiss of Reagan Gold Group LLC and Myself
3. I am a defendant in this action and a Manager and CEO of Reagan Gold Group ("RGG"). RGG is a limited Liability company that are organized under California law with the principal place of business in California. RGG's only brick-and-mortar location is in California, which is where I am domiciled as well.
- 4.) On November 21st, 2024, Plaintiff Anthony Trupia ("Plaintiff") sent a demand letter to RGG demanding \$15,000 for alleged violations of federal and state telephonic solicitation laws for a single, manually dialed attended phone call that was made to Plaintiff on November 3. I did not personally make the call to Plaintiff. A true and correct copy of the Demand letter is attached hereto as **Exhibit 1**.
- 5.) The letter threatens that, without payment, plaintiff would:
 - a.) File suit against RGG, which would "be very expensive, and may result in the complete bankruptcy of your company" because of purported damages and because "legal costs alone will easily eclipse the settlement offer"
 - b.) "contact all fifty State Attorneys General to inform them of [RGG's] business activities" and
 - c.) Refer to his "extensive spreadsheet list with every class action law firm... handling TCPA cases in the country" and "email of all of them with the case number when I file" in order to prompt "many other lawsuits."

6. Plaintiff is alleging that RGG 'spoofs' it's calls. This is false, RGG has partnered with Hiya (<https://www.hiya.com/>) to brand all of RGG's calls since April of 2023. A True and Correct copy of the RGG and Hiya Contract is attached hereto as **Exhibit 2**.

7.) Plaintiff is alleging that RGG VoIP provider is LEVEL 3 COMMUNICATIONS, LLC. This is also false, RGG has partnered with RingCentral (<https://www.ringcentral.com/>) since 2021. A True and Correct copy of the RGG and RingCentral Contract is attached hereto as **Exhibit 3**

8.) Plaintiff is alleging that RGG called from number 561-941-9685 on November 3rd, 2023. This is false, this number has no affiliations with RGG, it belongs to Defendant HERITAGE. The alleged call came in from a RGG number (310-424-4206), In addition Plaintiff is alleging RGG has called him hundreds of times, this is also false. A screenshot of RingCentral's reporting portal showing only 2 call attempts is attached hereto as **Exhibit 4**. in addition, I have also attached a screenshot from our CRM (Salesforce) showing the same information hereto as **Exhibit 5**.

9.) I have never been to Oklahoma.

10.) Pursuant to 28 U.S. Code § 1746, I declare under penalty of perjury under the laws of The United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on 7/19/2024, in Los Angeles, California:

By: _____

Steve Francis